



# BiTraDER Customer Engagement Plan

September 2022

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## Glossary

Active Network management	is the use of distributed control systems to continually monitor network limits, along with systems that provide signals to Flexible Resources to modify outputs in line with these limits <sup>1</sup> .
Aggregators	Organisations that contract with a number of smaller organisations and use the collective capacity to trade in the flexibility market
Connectee	Any individual or company connected to the electricity distribution network
Constraint	A capacity or voltage excursion which is when the demand or voltage is beyond the rating of the network asset.
Curtailement	Instructing connectees asset to turn up, turn down, system off or re-energise when a constraint is active.
Curtailement obligation	An obligation stated in a connection agreement for the connectee to turn down or turn off either their import or export in response to network constraints.
Distribution Network Operator	An organisation that own, operates and manages the electricity distribution infrastructure that delivers electricity from the transmission grid operated by National Grid, to end users (commercial and domestic properties). These regional companies are natural monopolies and are therefore regulated by Ofgem.
Distribution System Operation (DSO)	The systems and processes needed to operate energy networks in the net zero carbon future
Demand connection	An asset that is connected to the distribution network and requires import supply.
Demand increase (flexible service)	A connectee providing a flexible service to the DNO, ESO, or 3 <sup>rd</sup> party market where the outcome is an increase in demand (this could be provided by either generator reducing export, or a demand connectee increasing import within their maximum import capacity limits)
Demand reduction (flexible service)	A connectee providing a flexible service to the DNO, ESO, or 3 <sup>rd</sup> party market where the outcome is a reduction in demand (this could be provided by either generator increasing export within their maximum export capacity limits, or a demand connectee reducing import)
Flexible connection	Flexible Connections are Non-firm, connection arrangements whereby a customer's export or import is managed (often through real-time control) based upon contracted and agreed principles of available capacity. Flexible Connections typically allow quicker and cheaper connection to the network but have no defined cap on the extent to which a user's access can be interrupted.

<sup>1</sup> Definition provided as part of Open Networks: [TSO-DSO Project Initiation Document \(energynetworks.org\)](https://www.energynetworks.org)

Firm connection	<p>The term Firm is used to describe a connection that remains available in a first fault scenario. A clear example of a Firm connection is a connection of 2 or more circuits to maintain availability in the event of one circuit not being available (Single circuit connections are a clear example of an Un-Firm / Non-firm connection whereby the connection becomes unavailable after a fault and remains unavailable for the duration of the fault repair).</p> <p>A Firm arrangement is one which, in the event of a fault on, or the taking out of commission for maintenance or other purposes, any one circuit forming part of the connection arrangement, ensures continued availability of the agreed Maximum Import Capacity or Maximum Export Capacity (assuming that the wider network assets that the connection is connected to are intact and operating normally)</p>
Flexibility and Flexible services	<p>the modification of generation injection and/or consumption patterns, on an individual or aggregated level, often in reaction to an external signal, to provide a service within the energy system</p> <p>Flexibility Service - the offer of modifying generation and/or consumption patterns in reaction to an external signal (such as a change in price) to provide a service within the energy system.</p>
Flexibility service provider	market participant providing Flexibility Services to either the wholesale market or to System Operators.
Forecast	Refers to forecast of constraint that initiates the opportunity for a trade
Generation connection	An asset connected to the distribution network that requires import supply and exports energy back to the distribution network.
National Grid Energy System Operator (NG ESO or ESO)	The ESO is a natural monopoly in the flexibility market, acting as a neutral facilitator, the ESO has a role to monitor, control and actively manage the power flows on the broader electricity system (above distribution level) to maintain a safe, secure and reliable electricity supply
Non-Firm (Unfirm)	As distinct from Firm. Non-firm connections are typically single circuit whereby the connection becomes unavailable in the event of a fault or necessary maintenance. The connection remains unavailable for the duration of the necessary works. Non-firm connections have become commonplace for generator connections on distribution networks to reduce connection charges (due to less assets required than for 2 circuit connections).
Peer to peer/Bilateral trading	Trading between connectees, independent of the Distribution Network Operator, Distribution or Energy System Operator.
'Buyer'	Party buying the ability to continue uncurtailed and therefore buying a more preferable/unaffected merit order position
'Seller'	Party selling the ability to adopt the curtailment liability from another connectee, within the limits of their connection agreement

## BiTraDER background

### Problem

For many existing customers on the distribution network, signing up to long term curtailment obligations (via a non-firm network connection) can undermine the business case for some connected resources, particularly for low carbon generation assets. Many of these customers are therefore unlikely to accept a connection agreement that carries curtailment obligations – which could delay or reduce the deployment of low carbon generation assets.

BiTraDER aims to create a transparent trading market for high-voltage (HV) connected resources to trade curtailment obligations bilaterally, providing an opportunity to reduce the risks associated with agreeing to a flexible network connection. Using extensive engagement with the owners of connected resources culminating in their participation in a live network trial, BiTraDER will explore how access to a neutral market allows connected resources to trade their obligations bilaterally, encouraging more of them to enter the flexibility market and promote wider availability of flexibility on the distribution network, thereby reducing whole system costs.

This project is reliant on engagement with owners and operators of different commercial connected resources. Their input will be required to shape the trading market's design and sufficient participation will be needed for both the simulation and live network trials to be a success. Good customer engagement will therefore be vital in the success of the BiTraDER project to ensure that a sufficient range of expertise and opinions is captured.

### Objectives

The project aims to create learning across a number of specific areas, in conjunction with other forerunner industry projects also exploring other aspects of trading, and share learning with the industry, including the relevant working groups from the Energy Networks Association's Open Networks project.

BiTraDER aims to identify the data and systems required to support an independent market specific to trading curtailment obligations, including interfaces, system and data architecture, functionality required to facilitate data flows and dispatch. It also aims to identify a core set of trading rules to underpin trading, ways to create better visibility of merit order stacks, including how a solution like BiTraDER could alleviate conflicts between ESO and DNO markets.

Finally, the project aims to identify the appetite for trading amongst customers, their requirements from the platform and market rules, trading behaviours and feedback on trading experiences.

### Project Partners

BiTraDER is being led by Electricity North West, with three key project partners: Delta-EE, AFRY and Electron. Delta-EE is an energy research and consultancy service with a background in emerging distributed energy markets, they are responsible for the customer engagement process, all customer research throughout the project and supporting other key activities such as the simulation and live network trials.

Electron is an energy technology firm which specialises in digitally optimised energy marketplaces. Their experience includes building ElectronConnect, a platform that supports marketplaces for SSE,

NG ESO and London Hydro, and they designed the technology deployed in a real-time local marketplace in Orkney. They will be designing the market trading platform we will use as part of the project.

AFRY is a specialist consultancy who will be working on the development of trading rules, providing monitoring and evaluation of trades and outcomes, cost benefit analysis of the BiTraDER solution, and other activities such as interface and interaction with the ESO or regulator with regards to policy requirements.

## Research questions

The research questions we intend to answer throughout the project include:

1. Is there current and/ or future appetite for bilateral trading?
2. What real/perceived barriers and opportunities are there for customers in participating in bilateral trading?
3. How much do customers currently understand the merit order stack and wider flexibility market?
4. How do customers currently interact with the flexibility market? If not, why not?
5. What is the true cost to customers of providing flexibility? How does it benefit/impact their business?
6. What is the value to customers for potentially avoiding a curtailment obligation?
7. How suitable is the market platform for all users?
8. Does the platform cater for those with limited knowledge to extensive knowledge of trading and associated electrical impacts?
9. What are customers' expectations and requirements of a trading platform interface?
10. Does the market platform provide better visibility of the merit order stacks and does this visibility remove or reduce barriers to participation?
11. Could the visibility provided within the platform resolve conflicts for customers providing ESO flexibility services?
12. Could the platform make it easy/encourage customers to participate in both DSO and ESO markets?
13. What might encourage customers to participate in the flexibility market to allow dynamic, bilateral trading?
14. Could BiTraDER make customers, who wouldn't usually be interested in trading, more likely to trade on an ad hoc basis? If so, how?
15. What are customers' requirements to enable participation in the market, including access and trading rules?
16. What is the real behavioural impact of the rules on customers?
17. How practical are the trading rules for customers trading?
18. How do customers find the arrangements used as part of BiTraDER to enable dispatch (ie API)?

## About this engagement plan

This engagement plan aims to set out in detail how we will engage with customers and other stakeholders in the BiTraDER project. Specifically, it will:

- Outline our strategy for engaging with stakeholders and customers within the project.
- Identify, analyse and define how we will engage with interested stakeholders, and direct customers as part of the Project

- Identify, analyse and define the types and numbers of customers we will engage with, including consideration of achieving a reasonable mix of perspectives and representation for the trials
- Define what customers can expect as participants of the project and the associated timescales
- Define the most appropriate frequency and engagement methods (e.g. online surveys, in-depth interviews, quick calls, workshops etc.) for approaching and engaging with the different customers

## How the requirements of the governance document are being met

This document provides an overview of how the project will disseminate learning thereby complying with the requirements of the Ofgem Network Innovation Competition governance document.

### Customer impact assessment

This project will have no impact on connection domestic customers and there will be no interaction with 'Relevant Customers' or any Relevant Customer's premises (domestic or Micro-business customer). There are no anticipated impacts on customers in vulnerable circumstances.

Large commercial customers outside of the project may be affected during the live network trials if they are connected at the same BSP/GSP as the trial location, and the project is forced to enact contingency plans for enabling trades. The contingency plans involve the artificial creation of constraints on the network to trigger a scenario to facilitate trading in line with developed use cases. However, should the need for the contingency plan arise, the project team has funding available to provide compensation to any customers connected that are affected but are not active participants in the network trial.

As part of the development of the Live Network Trial plans, we will re-assess the risk to customers, including those that are connected in the trial area but are not participating in the project. The assessment will include consideration of potential interruptions.

### Stakeholder engagement strategy

The flexibility market is still developing, with pockets progressing at pace, specifically in relation to the tender and provision of flexibility services. The industry is being supported by a range of different projects<sup>2</sup> that fundamentally are targeting different aspects of the challenge, to remove barriers and encourage availability of and participation in flexibility across the UK.

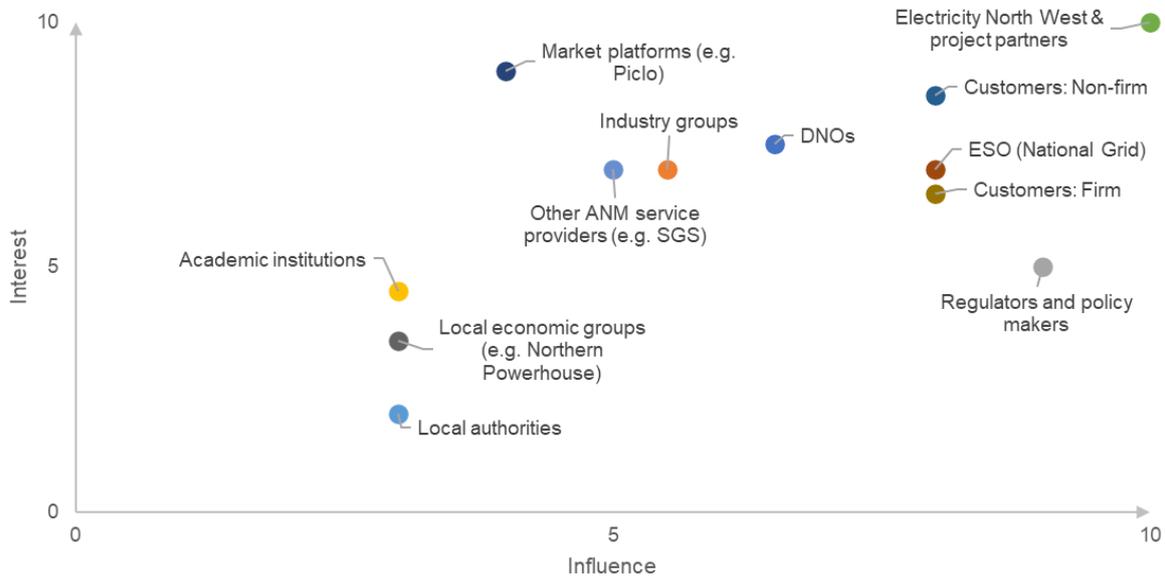
As such, we have identified a range of stakeholders who are likely to have some interest in the progress and development of BiTraDER. As a stakeholder group, we have also assessed in more detail the types of direct connected customers we will target to recruit to our project and participate in the development of the trading platform, our simulation, and later live network trials.

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<sup>2</sup> Some examples include Transition, Project LEO, Energy Exchange, Intraflex, TraDER, Visibility Plug and sockets, Testing co-ordinated DSO-ESO procurement and dispatch, EFFS, FUSION< Power Potential and Capacity to Customers. Details are included in our bid submission (appendix C): <https://www.enwl.co.uk/go-net-zero/innovation/key-projects/bitrader/bitrader-library/full-submission/>

## Stakeholder Identification & assessment

BiTraDER is required to share learning appropriately throughout the course of the project and continue to monitor learning shared from other industry projects. As such, building on learning from other projects, the following stakeholders were identified as having some interest in the project and considered carefully with regards to most appropriate methods for disseminating project learning.



**Figure 1: Stakeholder assessment**

More detail on the assessment and positioning of each of the identified stakeholders is provided in Appendix 2.

Based on this assessment we have outlined our engagement approach with each group:

Stakeholder	Frequency of communication	Method
Regulators and policy makers	Once a year	End of year reports and progress updates, deliverables
Network operators	Once every 6 months	Through the <a href="#">ENA Open Networks</a> project via their steering group and relevant Working/product groups
Non-firm Connected customers of large generation and demand sites (nationwide)	In line with project dissemination activities and ad-hoc/when required	Specific recruitment activities and wider stakeholder engagement newsletters, press releases

Stakeholder	Frequency of communication	Method
National Grid ESO	In line with project dissemination activities and ad-hoc/when required	Unless within project activities, via public dissemination activities: seminars, conferences and workshops, online engagement sessions, press releases  OR one on one meetings
Industry groups	In line with project dissemination activities and ad-hoc/when required	Public dissemination activities: seminars, conferences and workshops, online engagement sessions, press releases  OR one on one meetings
Local authorities (including Local Economic Partnerships and GMCA, Northern Powerhouse)	In line with project dissemination activities	Public dissemination activities: seminars, conferences and workshops, online engagement sessions  OR one on one meetings
Providers of ANM services	In line with project dissemination activities and any other targeted engagement	Public dissemination activities and one on one meetings
Providers of market platforms for trading		
Academic institutions	In line with project dissemination activities	Public dissemination activities: seminars, conferences and workshops, online engagement sessions, reports and deliverables

**Table 1: BiTraDER project dissemination activities**

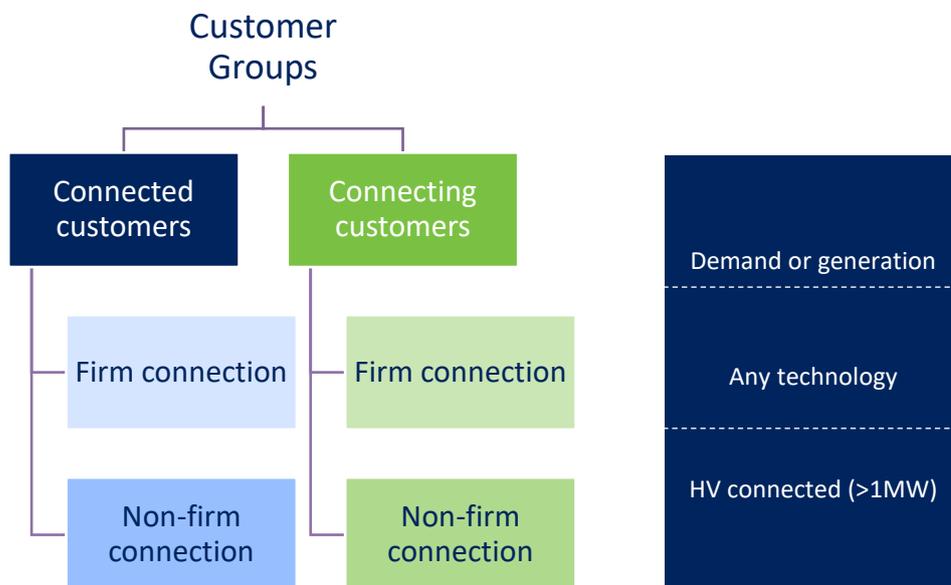
## Customer segmentation & recruitment

BiTraDER will be designed to capture the needs of current and future customers. As such, the project team have expanded our customer segmentation work to include those who are currently connected, with firm or non-firm connection agreements in place as well as those going through the connections process (accepted, not yet connected). The project is inherently technology agnostic, although we will require an appropriate mix of both generation and demand, and within this a balance of technologies to facilitate effective trading, as such we will monitor the technology mix through the recruitment process and adapt if necessary.

Based on the nature of the trading we anticipate through the platform, we will initially target customers who own or operate sites (or are processing applications) connected at HV level, using connection size as a proxy (approx. >500kW).

## Identifying customer groups

It is important that we target as many relevant customer groups as possible to maximise the representation of customers and trading activity (i.e. there are sufficient buyers and sellers in the marketplace). This diversity in customer participation will help us to develop a solution that better meets the needs of the diverse market, thereby encouraging more to participate in trading, and boosting the liquidity of the wider flexibility market. A summary of those identified is below:



**Figure 2: Customer groups**

There are two key customer groups which it is believed will experience benefits from the BiTraDER project, and as such are the two participation groups that we will target in the customer engagement process. Further subdivisions can occur, but the two groups are described as follows:

- Customers with a firm connection – These customers have not accepted a non-firm agreement and so are unlikely to be curtailed by the ANM system. They may be interested in selling their capacity during asset downtime or maintenance. This group also includes customers who have accepted a firm connection offer and are waiting to connect (ie future firm connection customers).
- Customers with a non-firm connection – These customers have accepted a non-firm connection when connecting to the distribution grid. They are sometimes curtailed by the ANM system and may be interested in trading their order in the merit stack. This group also includes those who have accepted, or may accept a non-firm connection in the future (ie future non-firm connection customers).

Sub-groups within these include:

- Customers who have accepted a non-firm connection offer and are waiting to connect
- Customers who routinely apply for connections (ie developers) and are/might consider a flexible or non-firm connection in future

## Eligibility criteria

In the initial stages of the project, the main objective is to ensure that a wide range of customers are considered for engagement so that no potential customers are prematurely assumed to be out of scope. Customer prioritisation and requirements will be refined throughout the market design. The sub sections below outline the various eligibility criteria that will need to be considered for the project participants.

### **Distribution Energy Resources**

This is a core focus of the project. Ideally customer engagement will be targeting customers with assets that are connected to the distribution network. In terms of voltage levels this will be customers connected to the HV/EHV network (33kV/132kV network).

### **Connection capacity limitations**

A minimum connection capacity size will be used to guide our engagement with HV customers. Furthermore, a minimum connection capacity can also be used as a proxy to ensure that, for data privacy reasons, individual named customers are not included in the trial (i.e. engagement is limited to business customers only). It has been suggested that the minimum capacity be set in the region of 500kW – 1 MW.

A connection capacity of 50MW has been suggested as an upper limit. Customers with connections larger than 50MW are more likely to be connected to the transmission network and therefore less likely to trade on the distribution network to solve distribution network constraints.

Both these assumptions will be tested throughout the market design and simulation trial phases of the project.

### **Geographical network area**

ENWL operate and maintain the distribution network in the north-west of England (see Figure 2). For participation in the development of the trading rules and simulated trials, we believe it is beneficial to reach out to customers across GB to ensure a greater range of customer groups are engaged. This will promote a wider representation of customers are involved in the development of the trading rules and richer level of learning in feedback from the simulated trials. A national approach could also help shape a solution that could be more readily adapted by other DNOs, facilitating a more efficient roll-out into BaU.

For the live trial, it is imperative that the assets are physically located in ENWL's network, in the same area, so that their trading helps address real network constraints. It is also important that these customers are connected to the specific location which meets the criteria for the live network trials as outline in our bid submission. However, for the market design and the simulated trials, there is no theoretical or technical limitation in using assets located in different parts of the country.



**Figure 3: ENWL operating area**

### **Technology neutrality**

As briefly mentioned above, the BiTraDER marketplace will be technology neutral, with the final merit order stack being determined based on the market’s perceived value of the curtailment for each generator and load. It is possible for generation assets that the initial BiTraDER merit order stack will put a value on carbon intensity but for the purposes of customer engagement, we will not be specifically targeting any generation type over others.

For the marketplace to work, there must be a mix of different buyers and sellers of curtailment, with different marginal costs of curtailment. This means that for the simulation and live trial phases we need to onboard a wide range of different generation and demand asset types. As we onboard participants, the additional types of participants that we will be looking for will therefore change depending on who we have already onboarded for the trials. For example, if we have already brought on 3 solar PV generators with flexible connections for the simulated trial then we will have to focus on onboarding customers from the other participant groups and sub-groups to ensure diversity in the marketplace.

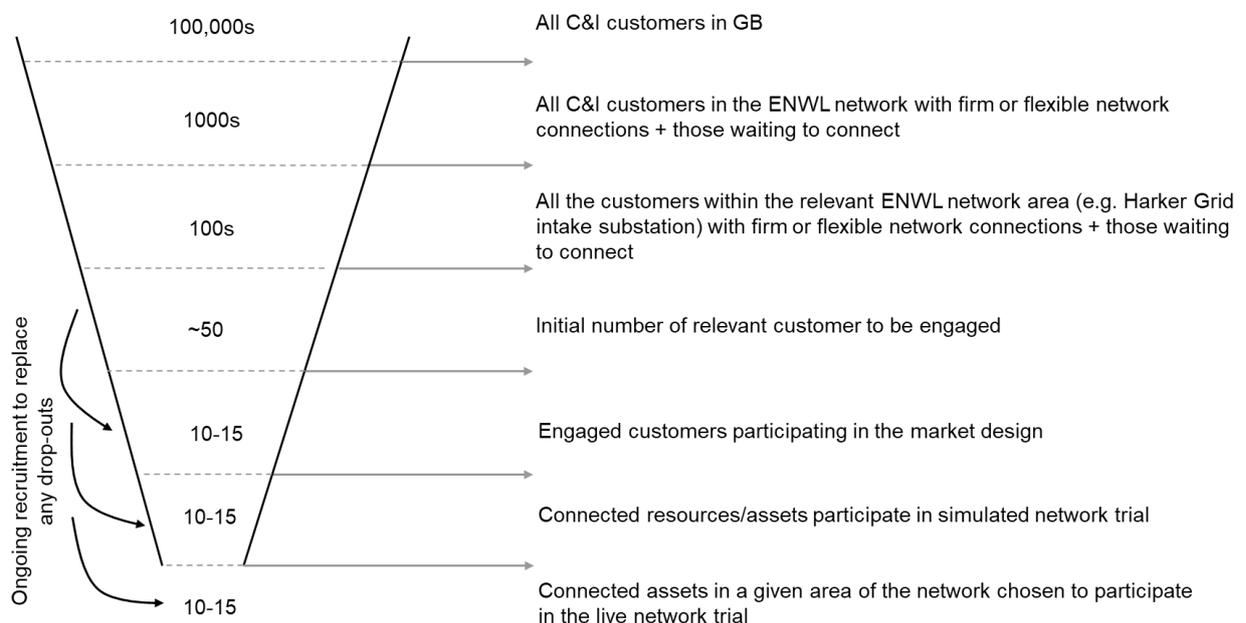
### **Aggregators**

Although the project is designed to target connected owner/operators, we are not actively excluding aggregators from participation. Aggregators could potentially increase in the variety of asset types that may be able to trade their capacity (unlocked via aggregators investment in asset control). This may help prevent the situation where too many similar generation assets are trying to trade capacities during similar circumstances, e.g. wind power on calm days. It also allows one point of contact with a number of connected assets, increasing simplicity for customers trading peer-to-peer. Furthermore, it is expected aggregators will be easier to engage with as they will likely be keen to explore additional value streams they could access for their customers via a new marketplace such as BiTraDER. Aggregators are also likely to be highly technically competent, presenting fewer barriers to active engagement with the project.

## Customer engagement funnel

BiTraDER aims to initially engage with up to 50 participants in order to have at least 10-15 engaged customers inputting into the market platform design. From this group we plan to select approximately 10 - 15 connected assets (i.e. could come from less than 15 customers/companies) to take part in the simulated and live network trials.

We will use the customer segmentation and eligibility criteria outlined above to contact up to 50 participants in the initial engagement. The general willingness to potential customers to participate in the project will be taken into consideration at this stage. The figure below illustrates how the pool of all potential participants can be narrowed down to the 10-15 participants required for the live network trials to take place in the last year of the project. We will work closely with the other project partners to determine the most applicable candidates from the project to ensure a sufficient range of insights and expertise are brought onto the project.



**Figure 4: Ideal customer engagement funnel**

It is expected that during the course of the project some customers may drop-out for various reasons – for example, they are acquired by another company, lose interest, their company plans / priorities change etc. It is therefore expected that recruitment of new customers will be required throughout the project to ensure a sufficient number diversity of project participants is maintained.

## Communications strategy

Our recruitment to the project will aim to identify customers who will want to participate throughout the duration of the project, however our communications strategy is designed to promote timely and effective engagement at key points through the project. We will harness learning from previous innovation projects to ensure customers are sufficiently engaged but not fatigued.

The project is designed into four key stages prior to closedown:

- Mobilisation
- Design
- Build
- Trials

We anticipate much of the customer engagement activity will centre around upfront recruitment and involvement in development of the trading rules and platform design, and then during the trials. Over the 'build' phase we anticipate a lighter touch to engagement, to keep participants up to date on progress and interested in the wider project.

During the Mobilisation (recruitment) and design phases we will:

- Identify possible customers connected to ENWL's distribution network who may be interested
- Identify other potential interested parties, connected in other DNO areas, based on existing relationships with project partners
- Conduct detailed interviews with each of the project participants to understand their current situations, pain points and, importantly, their interest in and willingness to participate in trading on such a platform to accelerate their connection to the network. These interviews will take approximately 1-2 hours per participant and will be carried out in year 1 of the project during the design phase.
- Hold workshops with customers to provide project updates and maximise stakeholder engagement in the project.

During the build phase we will:

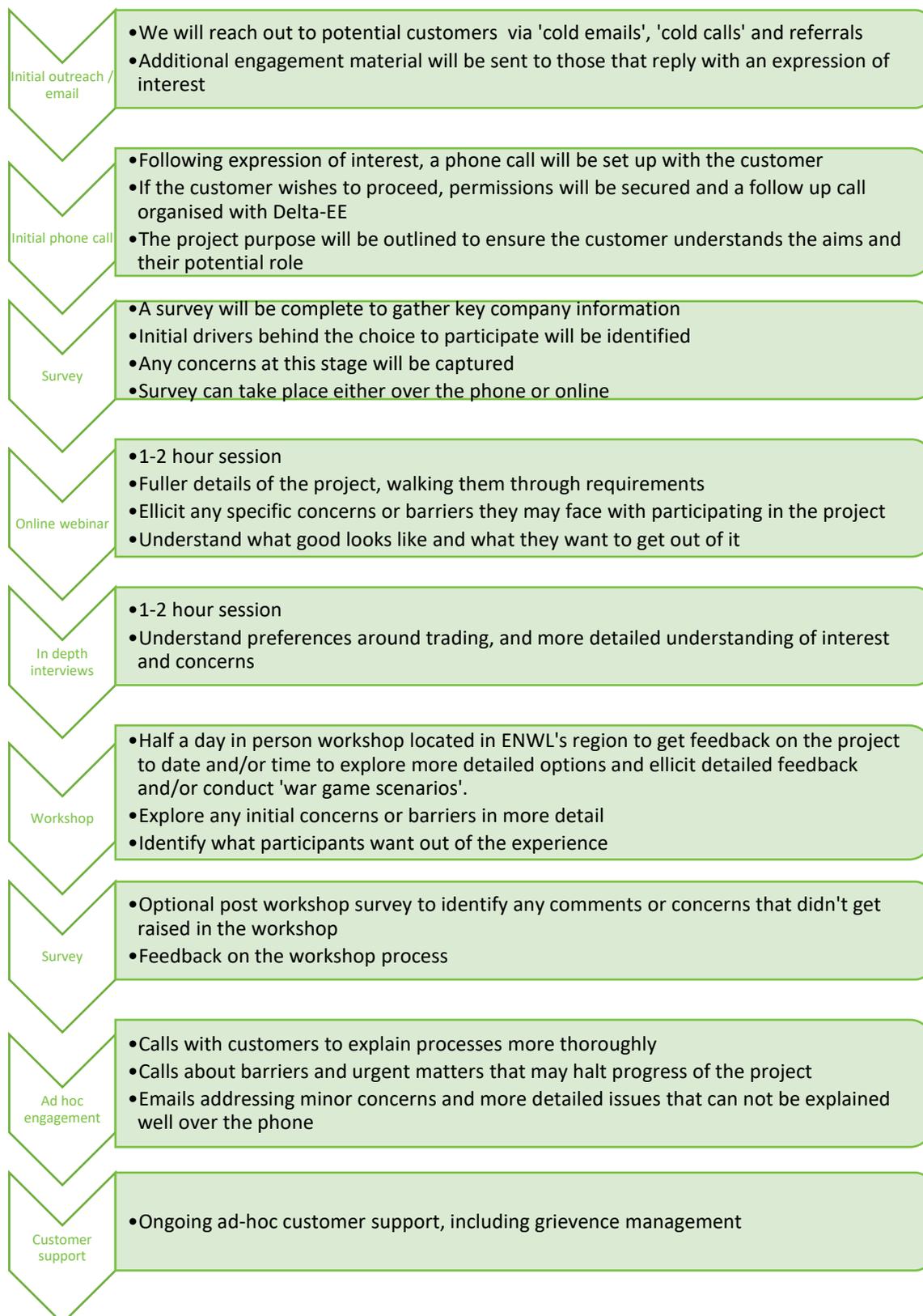
- Provide regular email updates on the project
- Invite customers to webinars and dissemination activities on the project progress and learning from the build phase
- Invite customers to review prototype versions of the platform for feedback on look and feel of the interface and user experience

During the trial phases we will:

- Hold workshops with customers to facilitate 'war games' to enact simulated trading scenarios and collate feedback on ease of access, functionality and trading rules.
- Undertake further interviews with project participants to understand their experience in participating in live network trading, feedback on use of the platform and the trading rules in practice.

In addition to this activity, we will also gather feedback via short calls, and provide ongoing customer support over the duration of the project.

We expect customers who agree to participate in the project to dedicate on the order of 0.5 days of time every 2 - 3 months (equivalent to 2-3 days of resource per year). This time is required to participate in calls, surveys, and workshops – as well as respond to emails and other communications related to the project.



**Figure 5: Anticipated participant engagement during the project**

Connection		Phone calls	Surveys	Interviews	Workshops
Non-firm connection	Generator	<ul style="list-style-type: none"> <li>- Discussing initial interest in the project.</li> <li>- Identifying issues and concerns around participation.</li> <li>- Providing early input to market rules considerations.</li> </ul>	<ul style="list-style-type: none"> <li>- Gathering company information</li> <li>- Initial concerns with participation</li> <li>- Details on assets, including capacity, voltage level, downtime, response time etc (exact data needed will be refined over time)</li> <li>- Identify reasons for taking part</li> <li>- Feedback on workshops</li> </ul>	<ul style="list-style-type: none"> <li>- In depth discussion on requirements</li> <li>- Discuss specific issues to generators</li> <li>- Identify what they would like to achieve with the project</li> </ul>	<ul style="list-style-type: none"> <li>- Get feedback on market rules to date and how generation assets could access this value stream</li> </ul>
	Load			<ul style="list-style-type: none"> <li>- In depth discussion on requirements</li> <li>- Specify the benefits to loads on non-firm connections</li> </ul>	<ul style="list-style-type: none"> <li>- Get feedback on the market rule structure and identify any issues with loads participating on non-firm connections. Note – there are likely to be very few (if any) demand customers with non-firm connections.</li> </ul>
	Flexible service provider	<ul style="list-style-type: none"> <li>- Discussing impact of curtailment on flexibility service provision</li> </ul>		<ul style="list-style-type: none"> <li>- In depth discussion on requirements</li> <li>- Discuss specific issues to generators</li> </ul>	<ul style="list-style-type: none"> <li>- Identify issues and get feedback on the proposed rules</li> </ul>
Firm connection	Generator	<ul style="list-style-type: none"> <li>- Discussing initial interest in the project.</li> <li>- Explaining the benefits to trading capacity.</li> </ul>		<ul style="list-style-type: none"> <li>- In depth discussion on requirements</li> <li>- Discuss specific issues to generators</li> </ul>	<ul style="list-style-type: none"> <li>- Ensure the rules are appealing enough to encourage firm connected loads to take part</li> </ul>
	Load	<ul style="list-style-type: none"> <li>- Gathering early information on asset availability</li> </ul>		<ul style="list-style-type: none"> <li>- In depth discussion on requirements</li> <li>- Specify benefits to firm connected loads, e.g. trading capacity during downtime.</li> </ul>	<ul style="list-style-type: none"> <li>- Ensure the rules do not conflict with existing service provision</li> </ul>
	Flexible service provider	<ul style="list-style-type: none"> <li>- Discussing opportunities for further flexibility in adopting curtailment liability</li> </ul>			

**Table 2: engagement objectives per customer segment**

## Engagement budget

We recognise that participation in the BiTraDER project will place additional burdens on those that participate. We have allocated a total budget of £112,000 over the lifetime of the project to cover the travel expenses of participants (to workshops / face to face meetings) and their time taken away from their day jobs to support the project. Customers will be required to submit invoices for their time as well as proof of expenses e.g. travel ticket receipts.

## Feedback and Review

### Financial grievance related to the live trial

During the live network trials, we aim to ensure the full range of network issues is tested. Although we have selected a section of network likely to experience a wide range of constraints, it is difficult to ensure that all use cases will occur during the trial period. As a consequence, it may be necessary to deliberately change asset ratings in ENWL operational systems to ensure use cases can be tested. Therefore, a contingency has been included by ENWL to compensate customers who are not trial participants where their energy output is impacted due to rating changes imposed, in order to test all use cases. Note that grievances related to financial loss on the live trial will be dealt with and administered by ENWL.

### General grievance

All grievances received will be logged initially with Delta-EE and passed to ENWL contact centre to be registered and investigated. Any complaints will be dealt with in compliance with [ENWL complaints handling procedure](#).

We will take the following steps in coordination with ENWL and other project partners (if necessary) to resolve any issues as quickly as possible:

- Step 1 – Getting full details of the problem and understanding the situation
- Step 2 – Identify the type of customer we're dealing with. This could be simply aggregator vs individual load, or generator vs demand. It is also important to understand the technical background of the customer, as this will dictate how the solution is communicated.
- Step 3 – Responding to the customer quickly. We will get back to the customer within 48 hours to acknowledge the grievance has been received. We will then raise any complex issues with the appropriate project partner, e.g. Electron or AFRY. Alternatively, we will find another solution to the problem ensuring the customer is kept up to date on progress.
- Step 4 – Present to the solution to the customer and verify the issue is resolved. It will be vital for future complaints and the whole design of the marketplace to understand if proposed solutions actually solve the issue.
- Step 5 – Follow up with the customer to check their level of satisfaction with the solution.
- Step 6 – Log the complaint to track trends.

## Customer Protection Requirements

In line the Electricity Network Innovation Competition Governance Document, referenced earlier, the following protections are in place.

### Customer Permission

Permission for use of personal data, and data associated with customers' connections and assets will be provided via a Letter of Engagement, which all participants will be asked to sign to register on the project. Participants will be fully informed by the customer researcher about how their personal data will be used and shared before they sign the consent document. By doing this they will agree to the learning and analysis from the in-depth interviews being used by the project. The customer researcher will inform the participant customers that their personal data will not be used nor shown in any analysis in a disaggregated manner.

### Safety Information

The project will not require the installation of any technology on the network or on customers' premises or assets. The scope of the project is to explore viable alternatives to SCADA systems, such as APIs etc which do not require the installation of any hardware. Therefore, it is not envisaged that BiTraDER will introduce any safety risks to customers.

### Further customer interactions

In line with section 8.10 of the NIC Governance Document, the project will not include visits or approaches of any kind to customers for any sales or marketing activity.

### Data Privacy statement

To be able to test bilateral trading and analyse the impact and behaviour of participants, with a view to understanding the future need and appetite for curtailment obligation trading, a range of data, including some personal data will be collected over the life of the project.

This data privacy statement describes how this personal data will be managed and summarises the steps that will be taken to comply with Data Protection Act 2018 (GDPR) and has been developed in line with ENWL's privacy policy, specially section 11.3 Innovations, available here:

<https://www.enwl.co.uk/misc/privacy-policy/>

The project will collect name, business telephone number, address, email address and company during recruitment. This data is necessary to meet the objectives of the project to ensure that a representative sample has been included in the engagement and the participants are contactable for research. However, this information will be anonymised in all reporting documents ensuring no individual can be identified, unless express consent is provided for quotes or comments relating to the project. For reporting purposes project participants will be categorised rather than referred to individually.

Delta-EE will not pass names, addresses or any other personal customer data to third parties other than to those partners who have a specific need for this information as part of the project. A DPIA has been developed with all project partners specifically with this project in mind, and partners are committed to adhere to it as part of their contractual obligations.

All customers sought to participate in this study will be provided with details and purposes of the project. In line with GDPR we will ensure that all respondents are given the right to be informed. This includes the following:

- Objectives of the Project
- The identities of the Project Partners
- Funding for the Project
- A brief summary of how they can be involved in the Project, including information on the customer research subcontractor, their obligations as a participant, and the timescales of the Project.

Although personal and business data will be collected by Delta-EE, Data Electricity North West are data controllers for this project. For the purposes of this project, Delta-EE are data processors. Data collected as part of the project will be anonymised upon project close down and ENWL and project partners will only have access to anonymised summaries, Anonymised technical data will be retained by ENWL to support transition of the solution to BaU.

Customers who participate in any customer engagement with Delta-EE will be fully informed about how their data will be used when they sign up. All recruitment data will be stored in a secure, confidential and appropriate manner and accessible only to the Delta-EE team for the duration of the project. All data relating to the project will be retained until completion of the project, when it will be destroyed. As part of the Project's close down procedure, all personal data will be anonymised and the original personal data will be permanently deleted. Following the Project's close-down, project partners may only retain anonymised results of their analysis.

In accordance with the requirements of the Electricity Network Innovation Competition Governance Document, this research will comply with Electricity North West's publicly available data privacy and sharing policy Electricity North West, Delta-EE or any other project partners or project supporter will not visit a premise of any customer for sales or marketing activities in connection with, in the context of or otherwise under the guise of the BiTraDER project. The full document is available to view here: <https://www.ofgem.gov.uk/publications-and-updates/version-30-network-innovation-competitiongovernance-documents>

## Engagement monitoring

We will keep a log of all interactions with customers and stakeholders. We will track the contact information of the participant and the type of query. This will help us analyse the types of queries coming in to identify common themes. These themes may eventually be addressed in the engagement materials / workshops. See Appendix 1 for an example of the data logging process.



## Stakeholder Identification & assessment

The full list of stakeholders identified by the project and their assessed interest in the project is provided below:

Stakeholder	Interest	Influence
Regulators and policy makers (Ofgem, BEIS)	<p>High – the project is required to consult Ofgem in advance of any significant changes to the original approach for the project, including our customer engagement and recruitment. Ofgem have a vested interest in ensuring value for money is delivered and that the project provides valuable learning and delivers agreed deliverables.</p> <p>BiTraDER BiTraDER is also expected to contribute towards meeting the aims set out in the governments Carbon Plan and Ofgem’s Decarbonisation Action Plan. These are both key priorities of Ofgem, BEIS and the UK Government and, furthermore, BiTraDER achieves this using Ofgem’s “flexibility first” mantra. BiTraDER will therefore provide outputs that could inform policy and regulatory decisions and as such, we expect that this customer group will be interested in the progress of the BiTraDER project.</p>	High - As an NIC project, BiTraDER is funded by Ofgem. Ofgem will therefore have ultimate control over the continuation of the project at the relevant stages.
Network operators (including TNO, DNOs)	<p>High - there are a number of other innovation projects that focus on different aspects of trading. DNOs and TNOs are likely to be interested to understand how the learning from BiTraDER interacts with other projects.</p> <p>The BiTraDER solution is intended to be designed to be easily adopted by other DNOs therefore they are likely to be interested in understanding the technical requirements for introducing BiTraDER.</p>	Medium – The project will be seeking input from other DNOs via the Open Networks projects to provide input and steer on key deliverables.
Project Partners	High – all project partners have a high interest in the learning and success of the project.	High – the project will be delivered on the strength of partnership involved.
Non-firm Connected customers of large generation and demand sites (nationwide)	High – these large commercial connected customers will be interested in having an opportunity to feed into how the market should look and feel, and how the trading rules should work, as the market could provide an opportunity for them to mitigate the risk associated with a curtailment, or identify a new potential revenue stream. This also includes investors in renewable sites, and developers who typically manage the application and build out of sites.	High – as a market based project, much of the learning will be delivered from our project participants who will input into the trading rules, requirements and feedback on the impact of trading.
National Grid ESO	High - NG ESO are considered a separate stakeholder as they will be providing input into the development of the solution, specifically with regards to improving market visibility and conflict resolution across DNO-ESO markets.	High – the ESO will be consulted on key deliverables

Stakeholder	Interest	Influence
Industry groups (ie Renewable UK, REA, Scottish Renewables and other UK lobbyist groups)	Medium – these stakeholders are likely to be interested in the broader outcomes of the project and in understanding the impact and benefits for customers with distributed renewable energy resources. For stakeholders in this group whose members may have ‘flexible’ or non-firm connections, they will be interested to understand how they can benefit from such a trading market and how it aligns with learning from other projects focusing on other types of trading (ie. on flexibility procurement).	Medium – we intend to develop the trading rules with input from our stakeholders and project participants, therefore it is likely they will have a material impact on the final solution developed.
Local authorities (including Local Economic Partnerships and GMCA, Northern Powerhouse)	Low/Medium - These groups will be interested in the customer benefits that the roll out of BiTraDER could provide such as reduced network operation costs, lower disruption associated with reinforcement activities, and its ability to remove barriers to the uptake of renewable energy solutions. Local authorities may also be interested in the results from the customer engagement activities undertaken as part of BiTraDER.	Low – Unless a LA has a site involved in the project trials, it is expected that this group will not be directly involved in the development of the solution or deliverables.
Providers of ANM services	Medium – providers of ANM services are likely to be interested in the technical and functional requirements of the solution, along with customer appetite for trading curtailment obligations to develop their own services and products.	Low – whilst we are open to feedback from all stakeholders on deliverables, only those directly involved in the project will shape the solution we develop.
Providers of market platforms for trading	Medium – current providers of market platforms, for flexibility service trading and procurement for example, may be interested in the appetite and requirements for curtailment obligation trading to develop their own services and products.	
Academic institutions	Low/Medium- This stakeholder groups includes universities and higher education establishments who could access the raw data generated in BiTraDER to support wider research in the area of flexibility markets, models and services. This group may have interest in the markets-based approach taken in BiTraDER to alleviate network constraints, and how the findings align with projects exploring flexibility service trading.	

# Electricity North West Privacy Policy

We are committed to protecting and respecting your privacy. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## 1 About us

Electricity North West Limited is committed to protecting the privacy and security of your personal information and to being transparent about how we collect and use that data to meet our data protection obligations in compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018.

This privacy notice describes how we collect and use personal information about you, in accordance with the UK GDPR and the DPA. This privacy notice covers the processing activities of Electricity North West Innovations.

Electricity North West Limited is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your information.

## 2 Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- relevant to the purposes we have told you about and limited only to those purposes
- accurate and kept up to date
- kept only as long as necessary for the purposes we have told you about
- kept securely

## 3 Information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection. Further information on how and why we collect, process and share special category and criminal offence data can be found in our Appropriate Policy Document (available on request from the Data Protection Officer).

We collect basic personal data from you when you contact us. Specifically, your name, address, telephone number and email address. We may also collect your bank details in certain limited circumstances. If you contact us, or we contact you, by telephone, we may also record the call for training and service improvement purposes and make notes in relation to your call.

We will also receive personal data about you from your electricity supplier. Bill payer details and metering point information is received by ENWL, in line with industry agreements and codes, such as the Retail Energy Code.

Electricity North West Limited may also receive your personal data from other third parties in relation to your electricity supply, such as your water and gas suppliers, our sub-contractors, National Grid, Members of Parliament, local authorities, housing authorities, charities and the Office of Gas and Electricity Markets (“Ofgem”).

For more information on personal data collected for our Priority Services Register specifically, please refer to this section below.

#### **4 Why do we need your personal information?**

We need to know your basic personal data to be able to maintain and operate the electricity distribution network for which we are responsible, to support and provide assistance where needed and to communicate effectively with you about your electricity supply.

#### **5 Legal basis for processing**

In order to process and use your personal information lawfully, we rely on the following legal bases:

- to comply with our legal obligations under the Electricity Act 1989, and associated licence conditions and industry codes
- for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract
- for reasons of substantial public interest to protect the most vulnerable in our society and put their needs first
- for our legitimate interests in ensuring effective operational management and internal administration, document retention/storage, compliance with regulatory guidance, exercise or defence of legal claims, product/service improvement and communicating with you with your consent, to maintain and develop our relationship with you, including marketing our products and services and market research. You may withdraw your consent at any time.

#### **6 Situations in which we will use your personal information**

The personal data we process is processed by our staff to:

- enable our customer contact centre to help you with any enquiries or complaints
- communicate with you by telephone, mail, text, email or social media about issues that may affect your electricity supply
- enable us to provide you with assistance in order to ensure the distribution of electricity to you and to contact you in the event of a loss of supply, an emergency or other incident, such as a storm
- monitor our work and maintain our records
- obtain feedback on how we can improve our services
- allow us to process charges in the event of damage to our equipment
- provide compensation to customers in certain circumstances
- comply with legal or regulatory requirements.

For the purposes of Network Management, IT support, email support and maintenance, we, or a third party who we share personal information with, may store and handle that personal information outside of the United Kingdom.

We will only permit this to happen if adequate safeguards have been put in place to protect your personal information. This means that we will:

- ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission or Information Commissioner's Office; or
- include standard data protection clauses approved by the European Commission or Information Commissioner's Office supported by the International Data Transfer Agreement (IDTA) for transferring personal information outside the UK into our contracts with those third parties.
- We may share your information with:
  - your electricity and water suppliers
  - your gas distribution network operator
  - other parties to energy industry agreements and codes, including the Retail Energy Code
  - Ofgem, the Energy Ombudsman and any other regulatory authority we may be subject to for the purposes of demonstrating compliance with applicable law and regulations
  - any member of the Electricity North West group of companies, sharing the same ultimate holding company or ultimate parent undertaking as Electricity North West Limited, as defined in sections 1159 and 1162 of the UK Companies Act 2006
  - our sub-contractors for the purposes of carrying out work on our electricity distribution networks
  - third parties contracted to provide services to us (including carrying out surveys on our behalf)
  - local public agencies such as the NHS, emergency services and local authorities (as required by the Civil Contingencies Act 2004)
  - our partners, at your request, to support you with being more energy efficient
  - our welfare partners to support our more vulnerable customers.
  - We may also use aggregate information and statistics in order to help us develop our services and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify any individual.

### **Electronic Communications**

From time to time, we may send routine customer service messages by electronic means, such as telephone, text or email, as required by our regulator, to let you know about issues that affect you, to check your details are up to date or to check whether anyone at your property requires additional support in the event of a loss of supply.

If you have provided consent, or we otherwise have the legal right to do so, we may send to you direct marketing and promotional materials relating to our services, engagement activities or related products, for example sending you communications (including by email) for these purposes. You can opt out of these messages at any time by clicking the "Unsubscribe" link in any of our emails or by emailing [electricitycustomerrelation@enwl.co.uk](mailto:electricitycustomerrelation@enwl.co.uk).

### **7 Data security**

We take the security of your data seriously. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **8 How long will we keep your information for?**

We will keep your information only for as long as necessary depending on the purpose for which it was provided. When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved
- legal obligation(s) under applicable law to retain data for a certain period of time
- regulatory requirements
- (potential) disputes
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

Details of retention periods for different aspects of your personal data are available in our Retention Policy which you can request by contacting us using the details below in the Contacting Us section.

## **9 Your rights**

You have the following rights regarding your information:

### **Right to be informed**

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this privacy notice.

### **Right of access**

You have the right to obtain access to your personal data (if we are processing it) and certain other information (similar to that provided in this privacy notice). This is so you are aware of the information we hold about you and can check that we are using your personal data in accordance with data protection law.

### **Right to rectification**

You are entitled to have your personal data corrected if it is inaccurate or incomplete.

### **Right to erasure**

This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep it. This is not a general right to erasure; there are exceptions.

### **Right to restrict processing**

You have rights to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further.

### **Right to data portability**

You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.

### **Right to object to processing**

You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.

### **Right to withdraw consent**

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to the use of your personal data for direct marketing purposes.

For more information on your rights or if you would like to exercise any of your rights, you are welcome to contact us at the contact details set out below.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **10 Contacting us**

If you would like to contact us in relation to your rights, or if you are unhappy with how we have handled your information, you may contact us as follows:

Address: Customer Relations Team, Electricity North West, 304 Bridgewater Place, Birchwood Park, Warrington, Cheshire, WA3 6XG

Email: [electricitycustomerrelation@enwl.co.uk](mailto:electricitycustomerrelation@enwl.co.uk)

If you would like to contact our Data Protection Officer, you may do so by contacting them at:

Address: Data Protection Officer, Electricity North West, 304 Bridgewater Place, Birchwood Park, Warrington, Cheshire, WA3 6XG

Email: [dataprotection@enwl.co.uk](mailto:dataprotection@enwl.co.uk)

If you are not satisfied with our response to any concerns about your data or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) at [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint) or write to them at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

### **11. Innovations**

This section applies to you if you have registered an interest in being kept up to date with new projects.

#### **What do we do with your personal information?**

If you register an interest in being kept up to date with any new innovation projects undertaken by us, a particular project or sign-up to be part of a particular project, we use your information to:

- send you newsletter communications with updates about our ongoing or new innovations projects; this may also include information on wider industry events such as those organised by other DNOs or the Energy Networks Association
- design projects to trial innovative technologies to help manage our network
- effectively deliver innovations projects
- verify any analysis carried out on those projects (which could include monitoring devices installed in customer homes and businesses)
- conduct surveys during or after participation in such projects.
- We may receive your information from third parties working in association or partnership with a particular project e.g. local housing associations.

In many cases, we deliver innovation projects with external partners such as local housing associations, and we may need to share your information with them to ensure that we can deliver the project successfully.

We may share your information with our third-party service providers, such as Impact Research Limited, who carry out engagement activities, surveys and/or research on our behalf.

## Delta-EE Data Privacy Policy

### **Our contact details**

Delta-EE

Address: Floor F, Argyle House, 3 Lady Lawson St, Edinburgh EH3 9DR

Phone Number: 0131 625 1011

E-mail: [BiTraDER@delta-ee.com](mailto:BiTraDER@delta-ee.com)

Website: [www.delta-ee.com](http://www.delta-ee.com)

### **Overview – need and purpose behind collecting customer data**

The BiTraDER project will investigate, develop and trial – live on the network – options for introducing a neutral secondary trading market that can be used by connected resources to trade their curtailment obligations within regionally aggregated “stacks”.

The processing activity will enable us to identify and engage with customers to ensure the market design meets their requirements. Furthermore, we will need to process customer data to identify and engage with the most appropriate customers for participation in simulated and live BiTraDER trials.

### **The type of personal information we collect**

We will collect and process the following information:

- Personal contact information: Name, contact email, phone number, business address
- Site details: type of connection to the electricity network, connected capacity, technology, GSP, energisation date
- Customer’s views / opinions and feedback relating to all aspects of the project: these include, but are not limited to, thoughts and views related to the market design of the BiTraDER project e.g. willingness to trade capacity, feedback related to the use of the simulated market platform, and data related to their engagement with the BiTraDER marketplace platform.

### **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Help to form a marketplace for trading electricity capacities
- Work out technical and feasibility of your site(s) for participating in such a marketplace
- Assess whether your circumstances are ideal for participation in trial activity relating to this project

We may share this information with BiTraDER Project Partners Electron (Chaddenwysh Services Ltd t/a Electron), Electricity North West Limited (ENWL), AFRY UK and Ofgem.

The data will primarily be gathered by supply of initial customer contact information from Electricity North West Limited (ENWL) and then further customer information will be collected via the customer engagement activities. These engagement activities include: initial outreach, early customer engagement interviews, four annual workshops, semi-regular calls, and online surveys.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do **this by contacting BiTraDER@delta-ee.com**
- **We have a legitimate interest.**

### **How we store your personal information**

Your information is securely stored. Your information may be stored in a range of electronic formats including Microsoft Excel spreadsheets which are stored securely on Delta-EE's SharePoint site. Initial customer contact data will also be stored securely in a restricted access folder on the ENWL server, and access via Huddle will only be given to those with authority. This data will be stored for a maximum of 6 years, or less. We will then dispose your information by deleting it off our servers / IT systems.

### **Your data protection rights**

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [BiTraDER@delta-ee.com](mailto:BiTraDER@delta-ee.com) if you wish to make a request.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [BiTraDER@delta-ee.com](mailto:BiTraDER@delta-ee.com).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>